

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

UTILITY WORKERS UNION OF AMERICA,)	NLRB CASE NO. 21-CB-14820
AFL-CIO (UWUA); INTERNATIONAL)	
CHEMICAL WORKERS UNION COUNCIL)	
UFCW (ICWUC); and THE UWUA-ICWUC)	
JOINT STEERING COMMITTEE)	
)	
Respondents)	Respondent's Request for Extension
)	
-and-)	
)	
SOUTHERN CALIFORNIA GAS COMPANY)	
)	
Charging Party)	
)	

Now comes Respondent, International Chemical Workers Union Council/UFCW (Union), by and through counsel, and hereby respectfully requests that the time for it to respond to the exceptions filed in the above-captioned case by the Counsel for the Acting General Counsel (General Counsel) and to file cross-exceptions be extended until January 7, 2011, for the reasons stated below.^{1/}

The time for responding to the General Counsel's exceptions and/or for Respondents to file cross-exceptions is December 16, 2011. During the past two weeks, Counsel for the other Respondents (with the Union's consent) has taken the lead and has been attempting to work with the General Counsel on full compliance (to the extent properly envisioned by the limited exceptions) such that all Respondents (as the Union understands) were agreeable to the date-correction of the

^{1/}Counsel for the other Respondents has asked that the Union request that they similarly be provided the same extensions that may be granted to the Union and the Union hereby so requests.

Notice being requested by the General Counsel and that the Notice would be posted per the Board's normal posting requirements for unions (including the new electronic notice-posting requirements, if applicable) without further need for this Board's intervention or further expenditure of limited taxpayer funds.^{2/} Granting the extension will permit the parties additional time in which to attempt to resolve these otherwise compliance issues.

Further, Counsel for the Union has been diverted by other scheduled (and other unscheduled) matters since receiving the General Counsel's exceptions on or about December 2, 2010, including, but not limited to, traveling, as previously scheduled, to Indiana between December 5-7, 2010, for witness preparation (as well as subsequent preparation) for a 2-day employee double-discharge hearing that will be held before U.S. District Court Judge Timothy Black on December 21-22, 2010; unexpectedly having to address a major allegation raised on December 10, 2010, by the employer in the matter before Judge Black that the local union involved had violated a confidentiality agreement that, thereby, allegedly permitted that employer to withdraw from the double-discharge hearing, requiring the undersigned's extensive legal research and conferences with Judge Black and the parties, so as to allow the December 21-22, 2010, hearing to go forward; and traveling, as previously scheduled, to Lakeland, Florida, on December 12-14, 2010, to prepare for a discharge arbitration that will be held in January, 2011. Consequently, the undersigned counsel, who represented the Union in the proceedings below, has not been able to adequately participate in the

^{2/} Apparently, a number of the locations that the General Counsel – without adequate evidence in the current record – has identified that she is seeking a revised order from the Board at which she wishes Notices to be posted are the personal homes of individual local union officers, even though the local unions – which are NOT respondents in this proceeding – do not all have their own offices. Respondents are not objecting to posting notices in their offices, even outside of Los Angeles, California, where Respondents normally post their Notices and the Union doubts that the Board wants to expend limited resources on whether the Notice has to be posted in a personal residence.

efforts to voluntarily resolve the (premature) compliance issues, and/or to sufficiently review the Judge's decision, Record, the exceptions, and research these matters, in order to determine whether (absent voluntary resolution of the compliance and General Counsel exceptions, which the Union prefers), the Union should file cross-exceptions and/or further oppose the exceptions.

WHEREFORE, the Union requests for good cause shown and not for the purpose of delay, that the time for responding to the General Counsel's exceptions and/or for the filing of cross-exceptions be extended until January 7, 2010.

Respectfully submitted,

s/Randall Vehar

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STATEMENT OF SERVICE

I hereby certify that a copy of foregoing was submitted **by** E-filing to the Office of the Executive Secretary of the National Labor Relations Board, on December 16, 2010. The following parties were served with a copy of the same document by electronic mail:

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